

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re)	
)	
TERRESTAR CORPORATION,)	Chapter 11
)	
Debtor.)	
)	Case No. 11-10612 (SHL)
)	
ALDO ISMAEL PEREZ,)	Adv. Proc. No. 13-01334 (SHL)
)	
Plaintiff,)	
)	
vs.)	
)	
TERRESTAR CORPORATION, et al.,)	
)	
Defendants.)	
)	

**STIPULATION REGARDING PLAINTIFF'S MOTION FOR LEAVE TO FILE
SECOND AMENDED COMPLAINT [DE 14] AND PLAINTIFF'S SUPPLEMENTAL
MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT [DE 18]**

Plaintiff, ALDO ISMAEL PEREZ, and Debtor/Defendant, TERRESTAR CORPORATION ("TerreStar"), by and through their respective undersigned counsel, hereby stipulate to the entry of the proposed order attached hereto as Exhibit "A" granting Plaintiff's Motion for Leave to File Second Amended Complaint [DE 14] and Plaintiff's Supplemental Motion for Leave to File Second Amended Complaint [DE 18]. TerreStar's non-opposition to Mr. Perez's filing of his Second Amended Complaint is without prejudice to any of its rights, claims, or defenses to the Second Amended Complaint.

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EXHIBIT A

(Proposed Order)

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ALDO ISMAEL PEREZ,)	Adv. Proc. No. 13-01334 (SHL)
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TERRESTAR CORPORATION, et al.,)	
)	
Defendants.)	
)	

**ORDER ON PLAINTIFF'S MOTION FOR LEAVE TO FILE SECOND
AMENDED COMPLAINT [DE 14] AND PLAINTIFF'S SUPPLEMENTAL
MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT [DE 18]**

This Cause, having come before the Court on the *Stipulation Regarding Plaintiff's Motion For Leave To File Second Amended Complaint [DE 14] and Plaintiff's Supplemental Motion For Leave To File Second Amended Complaint [DE 18]* and the Court, having reviewed the Stipulation and being otherwise fully advised in the premises, does hereby ORDER and ADJUDGE as follows:

1. Plaintiff's Motion for Leave to File Second Amended Complaint [DE 14], as supplemented [DE 18], is GRANTED;
2. The Second Amended Complaint to Revoke Order of Confirmation attached to Plaintiff Supplemental Motion for Leave to File Second Amended Complaint [DE 18] is hereby deemed filed; and

3. Defendant, TERRESTAR CORPORATION, shall respond to the Second Amended Complaint to Revoke Order of Confirmation within thirty (30) days of the date hereof.

Done and Ordered in Chambers in New York, New York on this ____ day of _____, 2014.

THE HONORABLE SEAN H. LANE
UNITED STATES BANKRUPTCY JUDGE